

ELIZABETH J. FOLEY

LAWYER, LTD.

601 S. Rancho Drive, Suite A-1

Quail Park II

Las Vegas Nevada 89106

Phone: (702) 363-2323 • Fax: (702) 380-4035

1 ELIZABETH J. FOLEY
2 NEVADA BAR NO.: 1509
3 MARGARET G. FOLEY
4 NEVADA BAR NO.: 7703
5 ELIZABETH J. FOLEY LAWYER, LTD.
6 601 So. Rancho Drive, Suite A-1
7 Las Vegas, Nevada 89106
8 Phone: (702) 363-2323
9 Fax: (702)380-4035
10 Email: Efoleylawyer@gmail.com
11 Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

12 MAX RUHLMANN and ERIC SAMBOLD,

CASE NO.: 2:14-cv-00879-RFB-NJK

13 Plaintiffs,

14 v.

~~PROPOSED~~ JOINT DISCOVERY
PLAN AND SCHEDULING ORDER

15 GLENN RUDOLFSKY, individually and DBA
16 HOUSE OF DREAMS KAUAI and HOUSE OF
17 DREAMS HAWAII; KIM D. RUDOLFSKY,
18 AKA KIMI DAPOLITO, individually; and DBA
19 HOUSE OF DREAMS KAUAI and HOUSE OF
20 DREAMS HAWAII
21 Defendants.

22 Plaintiffs, MAX RUHLMANN and ERIC SAMBOLD, by and through their undersigned
23 counsel, and Defendants, MAX RUDOLFSKY and KIM RUDOLFSKY through their counsel,
24 hereby respectfully submit a joint proposed Discovery Plan and Scheduling Order pursuant to LR
25 26-1(b).

26 A. The parties conferred by letters, emails and a telephone call multiple times in May as
27 required by Fed. R. Civ. P. 26(f). The parties agree to the following Discovery Plan.
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1 B. Discovery Dates:

2 1. Discovery Cut-Off Date:

3 The parties shall have one hundred eighty (180) days from the date this report is filed in
4 which to complete discovery. The parties believe that 180 days is sufficient for discovery in this
5 matter. The proposed discovery cut-off date shall be on or before November 28, 2016.

6 The Plaintiffs agree to Defendants' proposed date for Initial Disclosures of July 30, 2016.

7 2. Amending the Pleadings and Adding Parties:

8 Plaintiffs agree with Defendants' proposal that the last date for filing motions to amend
9 the pleadings or add parties shall be no later than ninety (90) days prior to the close of discovery.
10 The proposed date shall be on or before August 30, 2016.

11 3. FRCP 26(a)(2) Disclosures (Experts):

12 The Plaintiffs agree with the Defendants that the last date for disclosure of expert
13 witnesses shall be sixty (60) days before the close of discovery. The last date for disclosures
14 shall be on or before September 29, 2016.

15 4. Dispositive Motions:

16 The Plaintiffs agree with the Defendants' proposal that the last date for filing dispositive
17 motions shall be not later than thirty (30) days after the discovery cut-off date. The Dispositive
18 motions shall be made on or before December 28, 2016.

19 5. Pretrial Order:

20 The parties agree that the Joint Pretrial Order shall be filed within thirty (30) days of the
21 date set for filing of dispositive motions. The Order shall be filed on or before January 27, 2017.

22 6. FRCP 26 (a)(3) Disclosures:

23 The parties agree that the disclosures required by FRCP 26(a)(3) and any objections
24 thereto shall be included in the pre-trial order on January 27, 2017.

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1 7. Alternative Dispute Resolution. The parties have discussed the idea of settlement and
2 are amenable to settlement discussions. Plaintiffs have asked Defendants for documentation of
3 rent amounts and a settlement proposal. After discovery of rental income has been provided, a
4 settlement conference or mediation should be scheduled.

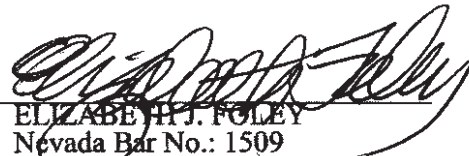
5 Discussions regarding settlement will continue once newly retained counsel for Defen-
6 dants has had opportunity to more thoroughly review the case file.

7 8. Alternative Forms of Case Disposition. The parties have considered alternative forms
8 of case disposition and do not feel that they would be appropriate for this case.


9 9. Electronic Evidence. Should this case proceed to trial, parties will be submitting
10 electronic evidence.

11 DATED this 1st day of June, 2016.

12 By:

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14 ELIZABETH J. FOLEY
15 Nevada Bar No.: 1509
16 MARGARET G. FOLEY
17 Nevada Bar No.: 7703
18 601 So. Rancho Dr., Suite A-1
19 Las Vegas, Nevada 89106
20 Attorney for Plaintiffs

21 By:

22 
23 VALERIE DEL GROSSO, ESQ.
24 Nevada Bar No.: 11103
25 2620 Regatta Drive #102
26 Las Vegas, Nevada 89128
27 Attorney for Defendants

28 IT IS SO ORDERED. LR 26-1(b)(10).

29 
30 NANCY J. KOPPE
31 United States Magistrate Judge

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